

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA**

Criminal No. 1:25-cr-130

United States of America,

Plaintiff,

vs.

Wendi Renae Wells,

Defendant.

**SUPPLEMENTARY
DEMAND FOR DISCOVERY**

Pursuant to FED. R. CRIM. P. 16 and all other applicable rules and statutes,
Wendi Renae Wells, through counsel, requests the following additional discovery:

- 1) A recording of Special Agent Prichard's meeting with K.L.R. (alleged victim) and K.L.R. (alleged victim's sister) on 03/24/25, 5:24 p.m. at Trinity Hospital (*see* Bates 373). If no recording exists, a statement about whether any facts of the March 23r incident at the casino were discussed during this meeting.
- 2) Any body camera footage from Officers Many and Grinnell showing their interactions with Ms. Wells in the casino bathroom and Ms. Wells being escorted to the patrol vehicle.
- 3) Any audio recording that may exist from when Detective Shook took Ms. Wells's DNA swab at the jail (*see* Bates 34).
- 4) Pictures to indicate exactly where the following swabs were taken by the North Dakota Bureau of Criminal Investigation (*see* Bates 708):

- a. Boot swab Item 3A (left lower area of right boot)
 - b. Boot swab Item 3B (left middle area of right boot)
 - c. Boot swab Item 3C (right upper area of right boot)
- 5) Any reports or recordings about an interview with Renita Howlingwolf related to this case (*see* Bates 716).
- 6) Although previously requested by letter on September 18, 2025, out of an abundance of caution, all *Giglio* materials related to Detective Shook.

Date: November 21, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dane", with a large, stylized loop at the end of the signature.

Dane DeKrey (#0397334)
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